

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	WC Docket No. 05-337
High-Cost Universal Service Support)	
)	CC Docket No. 96-45
Federal-State Joint Board on)	
Universal Service)	FCC 08-22
)	FCC 08-5
)	FCC 08-4

Comments

Montana Independent Telecommunications Systems
(MITS)

April 17, 2008

TABLE OF CONTENTS

1. BACKGROUND.....	3
II.	
INTRODUCTION.....	4
III. COMMENTS	
1. The identical support rule for non-rural CETCs should be eliminated and a phased-in transition for elimination implemented for rural wireless CETCs	5
2. A review of the existing high-cost mechanisms for rural and non-rural carriers must begin with an analysis of their differences.....	7
3. Modifications to the high-cost fund must underscore the link between CETC designation and post-designation compliance requirements.....	10
4. The MT PSC provides a model for public interest review and on-going regulatory oversight of CETCs	12
5. MITS supports the expansion of the definition of supported services to include broadband Internet service.....	13
6. MITS opposes the use of a reverse auction mechanism to determine the amount of high-cost support distributed to ETCs.....	15
7. The USF contribution base must be expanded to include all providers utilizing our national telecommunications infrastructure.....	15

IV.	
CONCLUSION.....	16

I. BACKGROUND

Montana Independent Telecommunications Systems (MITS) respectfully submits comments in response to the three Notices of Proposed Rulemaking (NPRMs), released by the Federal Communications Commission (FCC or Commission) on January 29, 2008.¹ Specifically, the Commission seeks comments on the recommendation of the Federal-State Joint Board on Universal Service (Joint Board) regarding comprehensive reform of the high-cost universal service program; Commission rules governing the amount of high-cost support provided to eligible telecommunications carriers (ETCs); and proposals for implementation of reverse auctions as the disbursement mechanism for determining high-cost support for ETCs serving rural, insular and high-cost areas.

Montana Independent Telecommunications Systems (MITS) is an organization of telecommunications companies, headquartered across Montana, that serve some of the most remote, sparsely populated, and high-cost areas of the United States.² MITS members are all landline rural incumbent telecommunications carriers providing telecommunications services within geographical areas ranging from 1,000 square miles to 30,000 square miles. The average population density within MITS member companies' service areas is 1.6 persons per square mile. Cumulatively, the companies serve only nine towns that have populations over 2,500. Cumulatively, they serve 21 towns that have less than 500 people. A typical exchange average is 450 people.

¹ *High-Cost Universal Service Support: Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-4 (rel. Jan 29, 2008) (*Identical Support Rule NPRM*); *High-Cost Universal Service Support: Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-5 (Rel. Jan 29, 2008) (*Reverse Auctions NPRM*).

² MITS members are: Nemont Telephone Cooperative, Northern Telephone Cooperative, Project Telephone Company, Triangle Telephone Cooperative Association, Central Montana Communications, InterBel Telephone Cooperative and Mid-Rivers Telephone Cooperative, Inc.

Absent federal universal service funding, the challenges of distance, density and demand would make access to telecommunications unaffordable for many consumers living within the rural, remote, and frontier areas served by MITS member companies, committed to provide quality telecommunications services within our large, sparsely populated state. Universal Service is vital to rural Montana.

We applaud the Commission for initiating these proceedings. We respectfully submit these comments.

II. INTRODUCTION

There is little disagreement that there are increasingly more and more strains on universal service funding and, in particular, the high-cost program. It is appropriate that the Commission, in conjunction with industry and consumer advocates, thoroughly re-examine the rules pertaining to the high-cost program including those that establish the administrative guidelines and requirements for receipt of universal service funds. In re-examining the existing rules and considering sound public policies for access to telecommunications, it is vital that we do not lose sight of the overriding universal service principles and goals established in Federal law with the passage of the Telecommunications Act of 1996 (“the Act” or the “96 Act”).

The 96 Act established a statutory mandate for universal service throughout our Nation. The proposals for universal service reform, including the proposals for the creation of additional universal service programs, must be considered within the context of the Act.

There is no lack of finger-pointing as the stakeholders, including industry, state regulatory agencies and the Commission, unilaterally recognize that there are problems with the current universal service mechanisms. However, many of the challenges we are facing today within the high-cost fund could have been avoided. We could have been better stewards in developing universal service public policy. Unfortunately, it appears that

self-serving interests and agendas may have often trumped responsible stewardship of universal service funds. We could have and should have done better.

MITIS does not agree that the most thoughtful approach to restraining the growth of high-cost universal service funds is to toss aside the existing program with the expectation that the implementation and administration of three new replacement programs will lead to the preservation and advancement of universal service as envisioned by the 96 Act.

We do agree, however, that the first step to meaningful fundamental universal service reform, while ensuring the sustainability of the fund, is to modify the *existing* high-cost universal service program. The Commission and the Federal-State Joint Board on Universal Service have identified areas that are problematic within the current funding program. MITIS suggests that policymakers first focus on modifications to the existing high-cost program before embarking down paths to establish new, separate funding programs, each with its own inherent complexities and untried solutions.

MITIS respectfully submits the following comments on issues identified within the three Notices of Proposed Rulemaking.

COMMENTS

1. MITIS supports the elimination of the Commission's current identical support rule for competitive non-rural ETCs. MITIS urges the Commission to initiate a separate proceeding to develop a rural competitive eligible telecommunications carrier (CETC) cost-based recovery mechanism as a replacement for the current identical support rule. MITIS recommends a phased-in transition mechanism for moving rural wireless CETCs to a cost-based high-cost recovery and elimination of the identical support rule.

Elimination of the Commission's current identical support rule may constitute a significant step towards reasonably controlling the growth of the universal service fund.³ The escalating growth in universal service funding is

³ 7 C.F.R. §54.307.

exacerbated by the ability of CETCs to receive universal service funds based not upon their own costs, but upon the costs of the incumbent ETC.

In many study areas, large wireless providers with regional and national footprints have been designated as CETCs with seemingly little or no post-CETC regulatory oversight. They receive substantial high-cost support that has no correlation to the cost of their own facilities, networks or operations. In rural and remote areas, the wireless CETC need not even be a rural telecommunications company as defined by the 96 Act to receive universal service support at a level identical to the incumbent rural telecommunications provider.⁴

The identical support rule, coupled with what in retrospect appears to have often been a wholesale designation of CETCs with minimal post-ETC designation oversight, has played a significant role in the growth of universal service funding.

The Commission recently has taken affirmative steps to control the growth of competitive universal service support. It has adopted provisions within orders approving certain mergers and acquisitions that condition transactions with the placement of an interim cap on the CETC level of universal service support. The Commission also established an exception from the application of the interim cap condition if the providers elect to file cost data showing their own per-line costs of providing service in a supported service area upon which their high-cost universal service support would be based. This approach, which has been implemented on a case-by-case basis in merger and acquisition proceedings, has the potential to help curb the CETC strains on the high cost universal service fund.

⁴ The FCC adopted, for USF, a definition of rural carrier that mirrors the definition of “rural telephone company”, Section 153(37) of the 96 Act. 47 U.S.C. § 153(37); *Universal Service First Report and Order*, 12 FCC Rcd at 8943-44, ¶310.

As a result, the Commission need not rush to a conclusion that, in order to relieve the growth of CETC funding, it must immediately eliminate the identical support rule for all wireless CETCs.

The Montana Public Service Commission (MTPSC) established mandatory compliance requirements within its CETC designation orders for rural wireless providers. These include network build-outs to extend the provider's wireless footprint within specified timeframes. Small rural wireless providers are aggressively expanding facilities into remote unserved areas in Montana, as required by the MTPSC. A phased-in transition to a cost-based methodology is appropriate for rural wireless CETCs committed to serving remote and frontier areas.

The rate of CETC growth has eased and the immediate stress on the high-cost fund attributable to CETCs has been reduced. This now allows a thoughtful, reasoned transition for the elimination of the identical support rule as it applies to *rural* wireless CETCs.

A phased-in transition for rural wireless CETCs has a twofold benefit. It allows for the development of a sound cost-based methodology for CETC high-cost support applicable to rural CETCs. Further, it affirms a level of predictability, which is vitally important to the many rural wireless providers that have demonstrated a long-term financial commitment to providing universal service by developing and deploying strategic plans for network expansions, incurring financial risks through investments in facilities and spectrum acquisitions, and by committing to rural subscribers that they too will have wireless access comparable to that available in urban areas.

The landline member companies of MITS, along with their affiliated wireless companies, urge the Commission to eliminate the identical support rule for *nonrural* CETCs. They further urge the Commission to initiate a proceeding to develop a cost-based methodology that would specifically be applicable to *rural wireless CETCs* and to develop a planned transition to an

alternative high-cost support methodology for rural wireless providers based upon their own costs.

2. The Joint Board recommended that the Commission establish a process and a timetable to review and to modernize the existing high-cost mechanisms for rural and non-rural carriers. Any such review must begin with an in-depth development of factual documentation and an analysis of the differences between rural and non-rural carriers, and among rural carriers themselves, similar to that conducted by the Rural Task Force ten years ago.

In July 1998, a Rural Task Force (RTF) was established pursuant to the Commission's May 8, 1997 Universal Service Order.⁵ Among its tasks was that of identifying issues unique to rural telecommunications companies and analyzing the appropriateness of proxy models for rural companies.

The RTF followed specific criteria to determine if the final universal service support mechanism implemented for rural telecommunications carriers would be reasonable. Now, ten years later, there is still validity in the criteria that set the parameters for the recommendations of the Rural Task Force to the Federal-State Joint Board on Universal Service. MITS suggests that the criteria that guided the Rural Task Force and, in turn, the Federal-State Joint Board on Universal Service may provide guidance today as the Commission once again considers modifications to the high-cost support mechanisms for rural carriers:

1. The proposed universal service support mechanism must meet the requirements of the law to preserve and advance universal service including the following:

a. The system ensures quality services are available at just, reasonable and affordable rates. Section 254(b)(1)

b. The plan is consistent with achieving access to advanced telecommunications and information services in all regions of the

⁵ *Federal-State Joint Board on Universal Service, Report and Order*, CC Docket No. 96-45, FCC 97-157, 12 FCC Record 8776, (May 8, 1997), Paragraph 253.

nation and with an evolving level of universal services. Sections 254(b)(2) and 254(c)(1)

c. The support mechanism ensures reasonably comparable rates and services between urban and rural areas. Sections 254(b)(3)

d. The plan requires all providers of telecommunications services to make an equitable and nondiscriminatory contribution to the preservation and advancement of universal service. Section 254(b)(4)

e. The plan provides a specific, predictable and sufficient source of federal support. Section 254(b)(5)

f. The system ensures that support will be used only for the provision, maintenance and upgrading of facilities to provide universal service. Section 254(e)

g. The system adopted helps facilitate Section 254(g) of the federal law which requires geographically averaged toll rates within states and from state to state.

2. The plan needs to have sufficient transition mechanisms and/or hold-harmless provisions to avoid “rate shock” for customers.

3. The fund should be portable between ETCs if the state Commission decides it is in the public interest to certify the additional ETC(s) in the area served by the RTC.

4. The plan ensures that consumers and businesses in high cost, rural and insular areas and states with significant high cost areas are not adversely affected by increasing reliance on marketplace forces.

5. The system can be maintained without significant administrative cost and burden.

6. The distribution of support is sufficiently disaggregated to ensure that support is not provided for serving only lower-cost portions of a supported area.

7. The support is sufficient and will remain available for as long as it is needed to fulfill the Act’s universal service purpose.

*8. Any support mechanism recommended by the RTF should be consistent with extending the benefits of a competitive telecommunications market to rural or insular areas and with the Act's principle of competitive neutrality.*⁶

In retrospect, the vast majority of the criteria utilized by the RTF have proven to be grounded on sound public policies.

The RTF issued six white papers between September 1999 and September 2000. Its in-depth analysis provided a foundation for the Joint-Board and the Commission to implement the current rural and non-rural high cost support mechanisms.

The Rural Task Force White Paper 2 described data assembled for the first time on a national basis that systematically compares and contrasts rural and non-rural carriers. It further documented a substantial diversity among rural carriers themselves. The RTF noted that an understanding of differences between rural carriers and non-rural carriers, and diversity among rural carriers is key to designing appropriate mechanisms and policies necessary to achieve the universal service principles required by the 96 Act.⁷

The RTF documented major rural carrier differences⁸:

- Both rural carriers and non-rural carriers serve rural communities. However, rural carriers' operations tend to be focused in the more geographically remote areas of the nation with widely dispersed populations.
- There is significant variation in study area sizes and customer bases among rural carriers.
- Isolation of areas served by rural carriers results in numerous operational challenges.

⁶ See http://www.wutc.wa.gov/rtf/old/RTFPub_Backup20051020.nsf/; Washington Utility and Transportation Commission archived Rural Task Force documents.

⁷ *Rural Task Force White Paper 2*, p.7, September 1999. See http://www.wutc.wa.gov/rtf/old/RTFPub_Backup20051020.nsf/; Washington Utility and Transportation Commission archived Rural Task Force documents.

⁸ Id. at pages 8-14.

- Compared to non-rural carriers, the customer base of rural carriers generally includes fewer high-volume users, depriving rural carriers of economies of scale.
- Compared to customers of non-rural carriers, customers of rural carriers tend to have a relatively small local calling scope and make proportionately more toll calls.
- Rural carriers frequently have substantially fewer lines per switch than do non-rural carriers, providing fewer customers to support high fixed network costs.
- Total investment in plant per loop is substantially higher for rural carriers compared to non-rural carriers.
- Plant specific and operations expenses for rural carriers tend to be substantially higher than for non-rural carriers.
- Income and demographic challenges, as well as advanced services issues, also impact rural carriers significantly.

MITS respectfully notes that the challenges facing its rural member telecommunications companies today are not significantly different than those they faced ten years ago. In 1999, the RTF concluded that the “one-size-fits-all” national universal service policy is unlikely to be successful in fulfilling the national universal service principles contained in the 96 Act:

“To be successful, policies and mechanisms ultimately adopted must be flexible enough to accommodate a wide range of market and operational circumstances faced by telecommunications carriers serving rural populations. As the definition of universal service evolves, so must these policies and mechanisms.”⁹

MITS recommends that there be an opportunity for refreshing the record developed by the RTF to determine the extent of the rural-nonrural differences at this time, as well as any current differences among rural carriers themselves. It is premature to set an objective of developing a

⁹ Id. at p 65.

“coherent system” that can be applied to all incumbent carriers before factually documenting the rural differences that exist today.

3. Modifications to the existing Universal Service high-cost fund must underscore the link between rigorous evaluations for CETC designation and receipt of universal service funds on the one hand and, on the other hand, compliance with stringent post-CETC designation requirements. ETC designation should be revoked for carriers that fail to advance universal service or comply with explicit post-designation oversight.

The explosive growth of the universal service high-cost fund was not an unavoidable consequence of the entry of additional providers into the telecom markets. Initially, seemingly with minimal consideration of public interest, States and the Commission designated competitive carrier after competitive carrier as being eligible to receive universal service high-cost funds. There were little or no standards developed and utilized for evaluations of public interest in CETC designation proceedings particularly in study areas served by non-rural incumbent carriers. There were little or no administrative rules applicable for post-CETC designation regulatory oversight. As the number of CETCs grew, each receiving universal service high-cost support based upon the incumbent provider’s level of support, the distributions from the universal service fund skyrocketed.

The Montana Commission (MTPSC) was one example of a state regulatory agency that “did it right” in CETC designations within study areas served by incumbent rural local exchange carriers (RLECs). The MTPSC applied intense scrutiny of CETC petitions within RLEC areas and thoroughly considered sound public policies for CETC designations. Rather than rushing to designate CETCs in rural study areas, the MTPSC focused on developing procedures to guide it in CETC designations. It was not until

April of 2005 that the MTPSC designated the first CETC for a RLEC study area.¹⁰

The MTPSC developed standards and criteria for CETC designations and oversight both within the orders it issued in contested case proceedings and by adopting specific ETC rules in April, 2005. The administrative rules and compliance requirements established within its orders provide a positive model for ETC designations and oversight.¹¹ By boldly refusing to designate CETCs capriciously or subjectively and by holding CETCs accountable for network expansions and service quality standards, the MTPSC held universal service funding in check. This is evidenced by the stark contrast in the percentage of increases in high-cost universal service fund (USF) disbursements for Montana ETCs versus ETCs for the Nation as a whole.

According to USAC data, from 2003 to 2007, the total nationwide Federal high-cost USF disbursements (non-rural and rural, ILECs and CETCs) increased by 31.4%. Yet, for the same period of time, the total Federal high-cost USF disbursements (non-rural and rural, ILECs and CETCs) for Montana increased by only 18.4%. Funding for Montana RLECs during the same period actually decreased by 4%.¹²

4. The Montana Public Service Commission provides a model for public interest review in CETC designations and for on-going regulatory oversight of CETCs.

The MTPSC provides a model for consideration as the Commission weighs options for post-ETC designation compliance requirements for CETCs. It established strict initial standards and rigorous continued oversight for carriers seeking to obtain Federal universal service funds. It set

¹⁰ *In the Matter of Cable & Communications Corporation dba Mid-Rivers Cellular petition for ETC designation*, D2003.8.105, Order 6518a, April 7, 2005.

¹¹ *Administrative Rules of Montana*, 38.5.3201 through 38.5.3230, Adopted April 29, 2005.

¹² *USAC Quarterly Filings with the FCC*. See www.usac.org/about/governance/fcc-filings/.

the bar high for CETC designations and established firm expectations for CETCs' ongoing compliance with certain regulatory requirements.

Typically the MTPSC initially requires CETC petitioners to file information that demonstrates the petitioner's current network coverage within the study area sought for CETC designation, as well as plans for expansion of its wireless footprint. For example, orders of the MTPSC have required wireless CETC compliance such as:¹³

- The filing of build-out plans, specific location of build-outs, and the population that will then receive coverage that did not previously receive wireless coverage.
- Filing data that indicates the percent of the study area population that the provider currently serves and the percent of the study area population that the provider will serve for a specified multi-year period following its CETC designation.
- Filing of plans indicating how the CETC will achieve greater study area coverage and to what extent it relies on the use of cell extenders, new towers, wireless access units, or resale.
- Assurances that the CETC will by means of its own resources serve all reasonable requests for wireless service at residences and businesses within the study areas.
- Providing maps for a specified multi-year period of actual signal coverage and map overlays for each wire center that indicates the CETC's coverage capability based upon transmission service quality of -104 dBm.

¹³ See *In the Matter of Cable & Communications Corporation dba Mid-Rivers Cellular* Petition for ETC designation, Final Order 6518a, Docket D2003.8.105, April 7, 2005; *In the Matter of Sagebrush Cellular, Inc. Application for Designation as an ETC*, Order No. 6687a, Docket D2004.1.7, December 7, 2005; *In the Matter of Triangle Communication System, Inc. Application for Designation as an ETC*, Docket No. D2004.1.6, Final Order No. 6723a (May 31, 2007) and Final Order on Reconsideration 6723b (August 14, 2007).

- Requiring CETCs to expand wireless coverage to reach a minimum of 98% of business and residential subscriber locations within a specified multi-year period.
- Filing facility build-out plans for multi-years and six-month reports on the progress in expanding wireless coverage.
- Filing quarterly Service Quality Reports to the MTPSC (for as long as the provider is designated an ETC) that reference the numbers of requests within the study area(s) that the CETC is unable to satisfy (including voice, e-mail, and letter communications from the consumer).
- Detailing unsatisfied service requests by location in each study area and providing a detailed description of why customer requests for service could not be satisfied.
- Documenting and reporting to the MTPSC the number of customer complaints, repeat complaints, the nature of the complaints, and the remedy employed to address each complaint. Based upon the records, it must be possible to map the complaints to addresses within each study area.

The MTPSC's stringent standards for ETC designations and certifications have provided protection against misuse of universal service support by CETCs in Montana. The FCC should consider the implementation of similar standards and post-designation oversight.

5. MITS supports the expansion of the definition of supported services to include broadband Internet service. MITS advocates that universal service funding, *within the context of the existing high-cost program*, will provide the incentives for additional deployment of broadband-capable networks in rural, insular, high-cost areas.

MITS recommends that the definition of universal service offerings be expanded to include broadband, with the definition of broadband amended to

reflect more accurately consumers' expectations for upload and download data speeds. MITS does not advocate creating an entirely new universal service program specifically to facilitate the deployment of broadband services. Facilitating the deployment of broadband services can be accomplished within the parameters of the existing universal service high-cost program.

Telecommunications networks have slowly been evolving from analog voice transport to networks that are suitable for numerous applications and a variety of technologies. We must begin the transition within the high-cost program to provide for cost recovery for providers building facilities capable of deploying broadband to meet the ever-increasing consumer demands for bandwidth. Preserving and advancing universal service is dependent upon high-cost support for building and provisioning robust network platforms that will continue to provide rural areas with services that are reasonable comparable to those provided in urban areas.

It is appropriate that universal service support the entire rural networks to ensure adequate loop support and network capacity to meet consumer expectations.

The goals of preserving and maintaining universal service, including broadband, may be achieved through regulatory oversight of ETC designations and post-designation compliance. Regulatory agencies can set guidelines for preserving and advancing universal service for carriers receiving high-cost funds.

MITS is concerned that states lack sufficient resources, including staff and funding, to assume additional responsibilities such as mapping broadband access, developing and publishing detailed maps of unserved areas, awarding and administering construction grants, and overseeing competitive bidding processes, as suggested by the Joint-Board. Further, it is difficult to envision how consumers would have access to comparable services at comparable rates in rural and urban areas across the Nation if individual

states are setting parameters for acceptable transmission speeds and quality of broadband service.

Reliance on state matching funds creates additional barriers to broadband deployment. State agency budgets are set by state legislatures that often have limited funds for new programs. Reliance on proposed state matching funds does not ensure sustainable, sufficient, or predictable universal service funding.

The goals of advancing universal service may be accomplished within the existing high-cost support program.

6. MITS opposes the use of a reverse auction mechanism to determine the amount of high-cost support distributed to ETCs.

MITS has commented on this issue in previous Commission filings.¹⁴ We continue to hold that reverse auctions would undoubtedly result in substantially diminished services and quality of services in rural, remote and frontier areas such as those served by MITS member companies. Reverse auctions would lead to unrealistically low bids for high-cost support that would in turn yield declining investments in telecommunications networks and facilities.

There is no evidence that reverse auctions will lead to preserving and maintaining universal service. It has not been shown that reverse auctions will result in comparable services and rates between rural and urban areas. The use of reverse auction mechanisms to determine the amount of high-cost support distributed to ETCs is inconsistent with the principles and goals of universal service.

¹⁴ MITS Comments filed in WC Docket No. 05-337 and CC Docket No. 96-45, October 10, 2006.

7. The contribution base upon which universal service funding relies must be expanded to include all service providers that utilize our national telecommunications infrastructure.

It is appropriate that revisions to the universal service program include modifications on the contribution side of high-cost funding. The contribution base should be broadened to include all telecommunications services and jurisdictions. All providers who touch the public switched telecommunications network in the delivery of services should be required to contribute to the universal service fund.

It is vital that we not only maintain but also advance our national telecommunications infrastructure. That is dependent upon there being adequate contributions to the universal service fund and adequate disbursements from the fund. All consumers benefit from the telecommunications networks.

The contribution base must be expanded to ensure sustainable universal service.

CONCLUSION

In re-examining the existing rules and considering sound public policies for access to telecommunications, it is critical that we do not lose sight of the overriding universal service principles and goals established in the Telecommunications Act of 1996. Proposals for universal service reform, including the proposals for the creation of additional universal service programs, must be considered within the context of the Act.

Fundamental universal service reform is best addressed through modifications to the current high-cost universal service program rather than the establishment of new programs. There is little to suggest that the

proposed new programs will either ensure the preservation and advancement of universal service or meet established universal service goals and principles.

High-cost universal service funds are the backbone for consumer access to telecommunications in rural and frontier areas. The conclusions of the Rural Task Force nearly ten years ago remain relevant today. Challenges facing rural telecommunications companies today are not significantly different than those previously identified by the RTF. There is still validity in the RTF's conclusion that a "one-size-fits-all" national universal service policy is unlikely to be successful in fulfilling the national universal service principles contained in the 96 Act.

As the Commission considers the broad public policy issues in examining universal service high-cost modifications, MITS urges it not to lose sight of the interests of rural subscribers and the rural providers committed to serving rural and frontier areas.

RESPECTFULLY SUBMITTED this 17th day of April,

2008

(MITS)

//Bonnie Lorang, General Manger
Montana Independent Telecommunications System

2021 Eleventh Avenue, PO Box 5237
Helena MT 59604-5237

406.594.9662